

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Sensa Verogna,

Plaintiff,

v.

Twitter, Inc.,

Defendant.

Civil Case No. 1:20-cv-00536-SM

**TWITTER'S MOTION TO DISMISS COMPLAINT
OR, ALTERNATIVELY, TRANSFER**

NOW COMES the Defendant, Twitter, Inc. ("Twitter"), by and through its counsel, Orr & Reno, Professional Association, and pursuant to Federal Rule of Civil Procedure 12(b)(6), moves to dismiss the complaint in its entirety or, in the alternative, and pursuant to 28 U.S.C. § 1404(a), that the Court transfer the case to the United States District Court for the Northern District of California. In support hereto, Twitter states as follows:

1. Twitter's argument in support of its Motion to Dismiss Complaint or, Alternatively, Transfer is set forth in its accompanying memorandum of law filed herewith.
2. In support of Twitter's Motion is the Declaration of Jonathan Eck, Esquire, which is submitted herewith.

WHEREFORE, the Defendant, Twitter, Inc., respectfully requests that this Honorable Court:

- A. Grant Twitter's Motion to Dismiss Complaint and dismiss, with prejudice, Plaintiff's claims and this action;
- B. In the alternative, transfer any surviving claims against Twitter to the Northern District of California; and
- C. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

Twitter, Inc.

By its attorneys,

ORR & RENO, PROFESSIONAL ASSOCIATION

Dated: June 1, 2020

By: /s/ Jonathan M. Eck
Jonathan M. Eck, Esq. (NH Bar #17684)
45 S. Main Street, P.O. Box 3550
Concord, NH 03302
(603) 223-9100
jeck@orr-reno.com

Julie E. Schwartz, Esq. (*motion for pro hac vice admission to be filed*)
Perkins Coie LLP
3150 Porter Drive
Palo Alto, CA 94304-1212
(650) 838-4490
JSchwartz@perkinscoie.com

CERTIFICATE OF SERVICE

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon the Plaintiff, *pro se*, via email.

Dated: June 1, 2020

/s/ Jonathan M. Eck
Jonathan M. Eck, Esq. (NH Bar #17684)